REMARKS

Claims 1-36 are pending in the application.

The Applicants respectfully request the Examiner to reconsider earlier rejections in light of the following remarks. No new issues are raised nor is further search required as a result of the changes made herein. Entry of the Amendment is respectfully requested.

Allowable Claim

The Applicants thank the Examiner for the indication that claims 4-12, 16-24 and 28-36 recite allowable subject matter, however, claims 4, 16 and 28 were previously amended to be in independent form. The Applicants respectfully request an indication that claims 4-12, 16-24 and 28-36 are now <u>allowed</u>.

35 USC 112 Second Paragraph Rejection of Claims 1, 2, 13, 14, 25 and 26

The Office Action rejected claims 1, 2, 13, 14, 25 and 26 as allegedly being indefinite under 35 USC 112. In particular, the Examiner alleged the phrase "associated with said at least one application program" is unclear.

Claims 1, 2, 13, 14, 25 and 26 are amended herein. It is respectfully submitted that claims 1, 2, 4-8, 10, 13, 15-19 and 27-52 are now in full conformance with 35 USC 112. It is respectfully requested that the rejection be withdrawn.

Claims 1, 13 and 25 over Okuda

In the Office Action, claims 1, 13 and 25 were rejected under 35 U.S.C. §102(a) as allegedly being anticipated by *A Dynamic Flexible Grouping over CORBA-based Network and its Application to Mobile Computing* to Okuda et al. ("Okuda"). The Applicants respectfully traverse the rejection.

Claims 1, 13 and 25 recite a method and system that utilizes a run-time engine in a mobile wireless client device <u>to create screen definitions with an application program **at run-time** AS IF the screen definitions had been defined <u>at compile time</u>.

The Office Action alleges Okuda discloses executing at least one application program by a run-time engine in a mobile wireless client device to create screen definitions at run-time with a DFG Runtime incorporated with a Java API and a DFG system that can support Netscape Navigator and Microsoft Internet Explorer that support screen definitions at run-time (See Office Action, page 3). The Applicants respectfully disagree.

Okuda discloses a Common Object Request Broker Architecture (CORBA) for <u>developing applications</u> within distributed heterogeneous environments (See Abstract). Dynamic Flexible Grouping (DFG) is scheduled by a manager within and across organizations for individual problems (See Okuda, section 2.3). The DFG system can support Netscape Navigator and Microsoft Internet Explorer (See Okuda, page 694 last bullet).

Netscape Navigator and Microsoft Internet Explorer are web browsers that process web page languages, i.e., HTML, SGML, XML, etc. <u>At run-time</u> a web browser can start at a <u>blank web page</u>, but typically <u>processes a home page</u> to be viewed on the web browser, with the <u>screen layout being defined by the web page language</u>. Okuda's software development system that relies on Netscape Navigator and Microsoft Internet Explorer does **NOT** disclose or suggest a method and system that utilizes a <u>run-time engine</u> in a mobile wireless client device <u>to create screen definitions with an application program **at run-time**</u> **AS IF** the screen definitions had been defined <u>at compile time</u>, as recited by claims 1, 13 and 25.

The Examiner alleges that the recited phrase "to create screen definitions associated with said at least one application program at run-time" is "only programming that is programmed to executed in a particular task." (See Office Action, pages 2 and 3). The Examiner alleges that the scope of the claims is "the method of execution applications" and that the recited "application program having function to create screen definitions is only the intended use of the executed application program." (See Office Action, page 3). The Applicants respectfully disagree.

The Examiner is ignoring claimed features. Hence, the rejection should be withdrawn because it fails to demonstrate that the applied reference discloses each and every element of the claim. See MPEP 2131. "The identical invention must be shown in as complete detail as is contained in the ... claim." Richardson v. Suzuki Motor Co., 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). "Anticipation cannot be predicated on teachings in the reference which are vague or based on conjecture." Studiengesellschaft Kohle mbH v. Dart Industries, Inc., 549 F. Supp. 716, 216 USPQ 381 (D. Del. 1982), aff'd., 726 F.2d 724, 220 USPQ 841 (Fed. Cir. 1984). Claims 1, 13 and 25 are directed toward a particular function of an application program that conventionally once compiled takes up a large amount of storage space, i.e., creating screen definitions. However, as discussed below, through use of a run-time engine screen definitions can be created at run-time that has an advantage over conventionally pre-compiling screen definitions.

The Examiner alleges that a "standard screen must comply with screen definitions; and thus a screen of the Client in Figure 2, web browser/windows, is ... a manufactory that provides the screen device fitted with the screen definitions so that every view transmitted from a server with a fit in the Client's screen." The Applicants respectfully disagree.

The Applicants are **NOT** claiming physical characteristics of a device's screen. Thus, a physical characteristic of a device's screen is **NOT** screen definitions that are created with an application program, as recited by claims 1, 13 and 25.

Finally, the broadest reasonable interpretation cannot be inconsistent with the specification, which illustrates the claimed screen definitions. Hence, "claims are not to be read in a vacuum, and limitations therein are to be interpreted in light of the specification in giving them their 'broadest reasonable interpretation.'" MPEP § 2111.01 at 2100-37 (Rev. 1, Feb. 2000) (quoting In re Marosi, 218 USPQ 289, 292 (Fed. Cir. 1983)(emphasis in original)).

A benefit of a method and system that utilizes a run-time engine in a mobile wireless client device <u>to create screen definitions associated with an application program</u> **at run-time** AS IF the screen definitions had been defined <u>at compile time</u> is, e.g., increased flexibility in modifying screen definitions with <u>less required storage</u>. Screen definitions that are defined at <u>compile time</u>, i.e., **prior to** run-time, are relatively fixed. As disclosed by Applicants' specification, mobile wireless client devices with such compile time screen definitions are pagers, Blackberry, etc. To change screen definitions <u>after compilation</u>, the screen definitions must be modified and <u>re-compiled</u>. Re-compilation for simple screen definition changes becomes increasingly tedious. Creating screen definitions at run-time eliminates <u>compilation</u> **and** <u>re-compilation</u> for changes, greatly simplifying making changes to screen definitions. Moreover, storing screen definitions that are defined at run-time take <u>significantly less storage space</u> than storage of compiled code that defines screen definitions **prior to** run-time. The cited prior art fails to disclose or suggest the claimed features having such benefits.

Accordingly, for at least all the above reasons, claims 1, 13 and 25 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

Claims 2, 3, 14, 15, 26 and 27 over Okuda in view of Microsoft

In the Office Action, claims 2, 3, 14, 15, 26 and 27 were rejected under 35 U.S.C. §103(a) as allegedly being obvious over Okuda in view of *The Windows CE SDK – The Tools You Need to Program the Handheld PC* ("Microsoft"). The Applicants respectfully traverse the rejection.

Claims 2, 3, 14, 15, 26 and 27 are dependent on claims 1, 13 and 25, and are allowable for at least the same reasons as claims 1, 13 and 25.

Claims 2, 3, 14, 15, 26 and 27 recite a method and system that utilizes a run-time engine in a mobile wireless client device <u>to create screen definitions with an application program</u> **at run-time** AS IF the screen definitions had been defined <u>at compile time</u>.

As discussed above, Okuda fails to disclose or suggest a method and system that utilizes a run-time engine in a mobile wireless client device <u>to create screen definitions with an application program</u> **at run-time** **AS IF** the screen definitions had been defined <u>at compile time</u>, as recited by claims 2, 3, 14, 15, 26 and 27.

Microsoft discloses Windows CE, an operating system for a Handheld PC (See page 1). Desktop emulation allows development of software using an existing Win32 compiler on any x86 machine running Windows NT (See Microsoft, page 2).

Microsoft discloses conventional software development which defines screen definitions for a Handheld PC **at compile time**, i.e., **prior to run-time**. Microsoft fails to disclose or suggest a method and system that utilizes a run-time engine in a mobile wireless client device <u>to create screen definitions with an application program</u> **at run-time** **AS IF** the screen definitions had been defined <u>at compile time</u>, as recited by claims 2, 3, 14, 15, 26 and 27.

The Examiner alleges that Windows CE operating system provided with a remote registry editor would display icons configured to represent at least one application program in response to configuration of the registry (See Office Action, page 3). The Applicants respectfully disagree.

Windows CE registry editor is an application. However, Windows registry operates in conjunction with the Windows to control how Windows operates in numerous ways including display of icons. However, Windows registry is **NOT** compiled and thus is not run. Thus, Windows registry editor does **NOT** create screen definitions **at run-time** **AS IF** the screen definitions had been defined <u>at compile time</u>, as recited by claims 2, 3, 14, 15, 26 and 27.
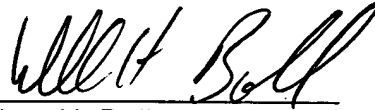
Thus, even if it were obvious to modify Okuda with Microsoft the theoretical result would be convention compilation of screen definitions **prior to** run-time, i.e., <u>at compile time</u> **NOT** at **run-time**, i.e., a method and system that utilizes a run-time engine in a mobile wireless client device <u>to create screen</u> <u>definitions with an application program</u> **at run-time** **AS IF** the screen definitions had been defined <u>at compile time</u>, as recited by claims 2, 3, 14, 15, 26 and 27.

Accordingly, for at least all the above reasons, claims 2, 3, 14, 15, 26 and 27 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

Conclusion

All objections and rejections having been addressed, it is respectfully submitted that the subject application is in condition for allowance and a Notice to that effect is earnestly solicited.

Respectfully submitted,

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